

Exhibit A

The Honorable Michael Scott

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CAROLYN WRIGHT, an individual,

Plaintiff,

v.

WALMART INC., a foreign profit corporation,

Defendant.

NO. 2:22-cv-00877

(KING COUNTY SUPERIOR COURT NO.
22-2-03620-6 KNT)

DECLARATION OF GABRIELLE
LINDQUIST IN SUPPORT OF NOTICE
OF REMOVAL BY DEFENDANT
WALMART INC.

(CLERK'S ACTION REQUIRED)

I, Gabrielle Lindquist, Esq., hereby declare and say:

1. That I am an attorney of the law firm of WILLIAMS, KASTNER & GIBBS
PLLC, and I am licensed to practice law in this Court.

2. I am over the age of eighteen and a U.S. citizen. I have personal knowledge of
the facts referred to in this Declaration and could competently testify to these facts if called
upon to do so in a court of law.

3. Along with Rodney L. Umberger, I represent WALMART INC. ("Walmart") in
the above captioned lawsuit, and I am making this Declaration in support of Walmart's Notice
of Removal to this Court.

4. This declaration is identifiable as **Exhibit A** to Walmart's Notice of Removal.

DECLARATION OF GABRIELLE LINDQUIST IN SUPPORT OF
NOTICE OF REMOVAL BY DEFENDANT WALMART INC - 1

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

1 5. Attached hereto as **Exhibit B** is a true and complete copy of the operative
2 Summons and Complaint filed in state court in this matter.

3 6. Attached hereto as **Exhibit C** is a true and complete copy of Plaintiff's
4 Response to Walmart's RCW 4.28.360 Request for Statement of Damages.

5 7. Attached hereto as **Exhibit D**, in accordance with LCR 101(c), are true and
6 complete copies of all additional records and proceedings filed in the underlying action.
7

8 I declare under penalty of perjury under the laws of the United States and of the State of
9 Washington that the foregoing is true and correct.

10 DATED this 22nd day of June, 2022.

11 WILLIAMS, KASTNER & GIBBS PLLC

12
13 /s/Gabrielle Lindquist

Rodney L. Umberger, WSBA No. 24948

Eddy Silverman, WSBA No. 53494

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19 *Counsel for Defendant Walmart Inc.*

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DECLARATION OF GABRIELLE LINDQUIST IN SUPPORT OF
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CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the date indicated below, I caused service of a true and correct copy of the foregoing document in the manner indicated below to:

CERTA LAW GROUP

☒ USPS

☒ E-mail

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Counsel for Plaintiff

Signed at Seattle, Washington this 22nd day of June, 2022.

WILLIAMS, KASTNER & GIBBS PLLC

/s/Ryan McDade

Ryan McDade, Legal Assistant
rmcdade@williamskastner.com

DECLARATION OF GABRIELLE LINDQUIST IN SUPPORT OF
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